

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE: JOHNSON & JOHNSON  
TALCUM POWDER PRODUCTS  
MARKETING, SALES PRACTICES,  
AND PRODUCTS LIABILITY  
LITIGATION

No. 3:16-md-02738-MAS-RLS

**[PROPOSED] ORDER GRANTING  
DEFENDANTS' MOTION TO  
COMPEL INSPECTION OF DR.  
WILLIAM LONGO'S  
LABORATORY**

**THIS MATTER** having been brought before the Court by Defendants Johnson & Johnson and LLT Management LLC ("Defendants") for an order granting Defendants' Motion to Compel Inspection of Dr. William Longo's Laboratory; and the Court having considered the moving papers; and for good cause shown;

**IT IS** on this \_\_\_\_\_ day of \_\_\_\_\_, 2024 hereby

**ORDERED** that Defendants' motion to compel is GRANTED.

**ORDERED** that Plaintiffs make the following available for inspection:

1. All PLM microscopes used by MAS at 3945 Lakefield Ct, Suwanee, GA 30024 for its analysis of the materials referenced in Defendants' Requests for Production Nos. 20-24 (dated April 18, 2024);
2. MAS's methodology for preparing the materials referenced in

Defendants' Requests for Production Nos. 20-24 (dated April 18, 2024) for subsequent analysis by PLM for the identification of "chrysotile," including but not limited to observing in real time the preparation of one or more samples of Johnsons Baby Powder performed by MAS; and

3. MAS's methodology for analyzing the materials referenced in Defendants' Requests for Production Nos. 20-24 (dated April 18, 2024) for analysis by PLM for the identification of "chrysotile," including but not limited to observing in real time the analyses performed by MAS on the samples of Johnsons Baby Powder, as well as Defendants' experts undertaking real time, contemporaneous observation of the samples on the same PLM equipment used by MAS in which MAS has previously reported, and may during the inspection report, observing "chrysotile."

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HON. JOEL SCHNEIDER, SPECIAL MASTER